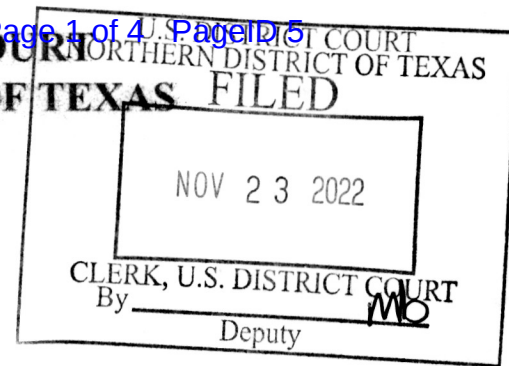


UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS



MARNAY HARRIS

Plaintiff

v.

**3-22CV2630-D**

Civil Action No.

Irving City Employees Federal Credit Union, Be  
Defendant

COMPLAINT

The Defendants (IRVING CITY EMPLOYEES FEDERAL CREDIT UNION (ICEFCU), Beverly Alexander, Jeff Crumly, and Jim Ladner) have violated the Plaintiff, Marnay Harris, a federally protected natural person specifically under Title 15 Chapter 41, Truth-In Lending Act (TILA) and the Fair Debt Collections Practices Act (FDCPA), the actions of the Defendants directly harmed myself and my family. On October 4, 2021, I applied for an extension of credit, and ICEFCU turned my extension of credit into a loan, a violation of 15 USC 1692j. At the time of the transaction, I was uninformed about the use of credit, was not given adequate notice of the extension of credit, a violation of 15 USC 1611, for failure to disclose rights enacted by Congress they continued to harm myself and my family. I requested a validation of debt, under 15 USC 1692g and ICEFCU did not send the written statement of debt validation-they defaulted on the requirements under federal law. ICEFCU has harassed and willfully harmed me in an attempt to collect a debt (15 USC 1692b), which makes them a debt collector so FDCPA is applicable. ICEFCU's harassment and abusive communications continued even after a cease and desist 15 USC 1692c(c), I requested debt validation after which ICEFCU began a constant stream of abusive communications, and trying to ruin my reputation causing a lack of sleep, panic attacks and a strain in my relationship with my ex-husband, they also harassed him at his job, and he is active duty military. I have missed work and had a mental breakdown in October 2022. ICEFCU and Beverly Alexander, specifically has caused mental anguish, she called and harassed me on numerous occasions the most through this entire ordeal in an attempt to destroy my ability to extend credit by reporting this alleged debt 180+ days past due. I am attempting to purchase a home for my family, and am unable to do so because of this alleged debt and invasion of privacy under 15 USC 6801. Credit score is 580 from 749

\* Attach additional pages as needed.

Date 11/16/2022  
Signature Marnay Harris  
Print Name Marnay Harris  
Address 2112 Sandy Lane  
City, State, Zip Irving, TX 75060  
Telephone (214) 636-4453

Irving City Employees Federal Credit Union,  
Beverly Alexander, Jeff Crumly, Jim Ladner

Defendant



The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Marnay Harris

(b) County of Residence of First Listed Plaintiff DALLAS

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

**DEFENDANTS**IRVING CITY EMPLOYEES FEDERAL CREDIT UNION,  
BEVERLY ALEXANDER, JEFF CRUMLY, JIM LADNERCounty of Residence of First Listed Defendant DALLAS

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED

Attorneys (If Known)

RECEIVED

NOV 23 2022

mb

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander			<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability			<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine			<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability			<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle			<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury			<input checked="" type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 850 Securities/Commodities/Exchange
				<input type="checkbox"/> 890 Other Statutory Actions
				<input type="checkbox"/> 891 Agricultural Acts
				<input type="checkbox"/> 893 Environmental Matters
				<input type="checkbox"/> 895 Freedom of Information Act
				<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 USC 1692g

Brief description of cause:

Not fulfilling the requirements to validate the alleged debt-validation.

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$  
\$1,100,000.00CHECK YES only if demanded in complaint:  
JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

11/16/2022

SIGNATURE OF ATTORNEY OF RECORD

Marnay Harris

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Marnay Harris  
115 Embury Lane  
Warner Robins, GA 31088

7020 3160 0001 5083 9098



7020 3160 0001 5083 9098

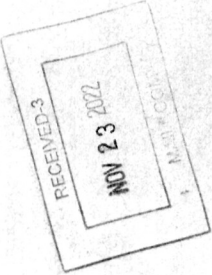
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WARNER ROBINS, GA  
NOV 23 2022  
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ADC 23



CHECKED NOV 22 2022

TX  
North District Court  
1100 Commerce St. Suite #1452  
Dallas, TX 75242

Handwritten signature